Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Application by BellSouth	)	
for Authorization to Provide In-Region,	)	CC Docket No. 02-35
InterLATA Services in Georgia and Louisiana	)	
	)	

REPLY COMMENTS OF WORLDCOM, INC. ON THE APPLICATION BY BELLSOUTH FOR AUTHORIZATION TO PROVIDE IN-REGION, INTERLATA SERVICES IN GEORGIA AND LOUISIANA

Marc A. Goldman
JENNER & BLOCK, LLC
601 13th Street, N.W., Suite 1200
Washington, D.C. 20005

(202) 639-6000

Lisa Smith
Keith L. Seat
WORLDCOM, INC.
1133 19th Street, N.W.
Washington, D.C. 20036

(202) 887-2993

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INTRODUCTION AND EXECUTIVE SUMMARY

BellSouth has made no significant improvements in the weeks since WorldCom filed its initial comments in response to BellSouth's renewed joint section 271 application for Georgia and Louisiana. BellSouth has not agreed to vital revisions in its change management process. Nor has its operational support systems ("OSS") performance improved. To the contrary, new evidence confirms the critical nature of deficiencies WorldCom previously pointed out.

Although the Department of Justice now expresses tepid support for BellSouth's application, conditioned on this Commission's review of concerns expressed in its Evaluation, it points to few changes to address the issues that led to withdrawal of BellSouth's prior application. While DOJ is correct that BellSouth's OSS has improved slightly from the dismal state that existed when it initially applied for section 271 authority last Fall, the question is whether BellSouth now offers adequate, nondiscriminatory OSS. It does not. Most of the core concerns that led to withdrawal of BellSouth's prior application – a defective change management process, continued problems with its due date calculator, service order accuracy issues and unreliable performance data have not yet been corrected. Other significant OSS issues, such as incomplete line loss reports, exist as well.

Moreover, no party has provided further evidence that the OSS in Louisiana is identical to that in Georgia. As WorldCom previously explained, there are significant reasons to think the OSS is different. Commercial experience in Louisiana remains too limited to show the readiness of OSS there; as DOJ noted, "entry via the UNE-platform in Louisiana is still minimal." DOJ Eval. at 7.

Unfortunately, BellSouth still needs to resolve a significant number of existing systems issues before section 271 authority would be appropriate for the important "anchor" state in the BellSouth region. Moreover, BellSouth needs to begin working much more effectively with CLECs to resolve new OSS issues as they arise. In addition, BellSouth must resolve problems with its UNE rates. which still are not cost-based. These rates do not permit broad-based residential entry in Louisiana, and limit WorldCom's competitive efforts to a single zone in Georgia. But BellSouth's delay in providing its cost models in a form usable for analysis may necessitate a subsequent submission by WorldCom on pricing issues.

WorldCom continues to try to work with BellSouth to resolve the practical systems issues, but is finding it unreasonably difficult. The Commission should continue to send BellSouth a strong message that it must work to fix its systems and cooperate with CLECs before gaining interLATA entry. Thus, the Commission should deny the current application and encourage BellSouth to resolve its problems, and ensure that the fixes actually work through commercial experience or valid third-party testing, before again seeking section 271 authorization.

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A	Reply Declaration of Sherry Lichtenberg	Operations Support Systems

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Declarations	
Reply Decl. Lichtenberg	Reply Declaration of Sherry Lichtenberg on Behalf of WorldCom (Tab A hereto).
DOJ Evaluations	
DOJ Eval.	Evaluation of the Department of Justice, In re Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana, CC Docket No. 02-35 (filed March 21, 2002).
Filings	
Ga. PSC Comments	Comments Georgia Public Service Commission, In re Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana, CC Docket No. 02-35 (filed March 4, 2002).

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BellSouth's OSS continues to suffer from serious problems that must be resolved before BellSouth may properly receive in-region interLATA relief for an "anchor" state to which other BellSouth states can be compared. The primary change in the few weeks since WorldCom's initial Comments has been BellSouth's implementation of the Single C order on March 23, 2002. It will take some time to determine the extent of any problems with this release, although BellSouth has already reported one anomaly. The other fundamental problems WorldCom has reported with BellSouth's OSS have not been resolved.

Almost all of the parties that commented on BellSouth's application continue to find deficiencies with it. Commenters Network Telephone, Birch, AT&T, Xspedius, Allegiance, Comptel, US LEC, XO Georgia, KMC Telecom, and Mpower all continue to report significant problems with BellSouth's OSS. Moreover, KPMG continues to open observations and exceptions in its Florida testing that support WorldCom's conclusion that BellSouth's OSS is not yet ready. BellSouth has neither resolved the specific systems issues that currently exist nor fixed its change management process. This means that BellSouth is unlikely to be able to resolve future problems as they arise – even if it eventually resolves specific systems issues that currently exist.

A. No Progress Has Been Made on Change Management

The importance of an effective change management process cannot be overstated. Change management underlies all other OSS issues, as it ensures that necessary changes are made to eliminate defects in existing OSS, to adapt to the ever-changing needs of the telecommunications market, and to implement changes without causing significant disruption for CLECs. To date, BellSouth's process has failed to serve any of these purposes. BellSouth also has not ensured its future performance will improve.

With one exception, BellSouth has not yet agreed to the substantial alterations in its change management process necessary to ensure implementation of important change requests prioritized by CLECs or to ensure smooth implementation of those changes that are implemented. In WorldCom's initial comments, we discussed the essential modifications to BellSouth's process that could begin to address these problems. In a meeting today, BellSouth finally agreed to the definition of "CLEC affecting change" proposed by CLECs. This is real progress. But that modification alone will not eliminate the problems that have become apparent in BellSouth's existing process, as WorldCom explained in its initial comments. BellSouth has not yet agreed to any of the other vital modifications proposed by CLECs – nor proposed effective alternatives to these modifications. Lichtenberg Reply Decl. ¶¶ 44, 46.

Nor can BellSouth rely on a proven track record of effectively implemented changes. BellSouth has not demonstrated empirically that it will now respond effectively to CLEC requests for changes. BellSouth also has not shown that it is capable of smoothly implementing those changes it does implement. As DOJ observes "in implementing [recent] changes to its OSS BellSouth appears to have violated important change management principles." DOJ Eval. at 7.

Indeed, KPMG continues to open observations and exceptions in Florida showing that BellSouth's existing process is severely deficient, adding to the list of observations and exceptions KPMG has opened with respect to change management. On February 22, 2002, KPMG opened Exception 155 because BellSouth "fails to provide the Business rules and user requirements for Minor releases in accordance with the intervals defined in the Change Control Process." KPMG provided numerous examples of this failure, supporting the conclusion of WorldCom and other CLECs on this score. KPMG also opened Exception 157 on March 4, 2002 because "BellSouth fails to follow its software testing and quality processes," resulting in the release of defective interfaces into production. Thus, just as WorldCom posited, and contrary to BellSouth's assertion, it is clear that BellSouth's releases contain far more defects than a typical software release.

Moreover, once problems develop either as a result of a defective release or for some other reason, BellSouth generally provides very little assistance to CLECs in correcting these problems. After BellSouth withdrew its prior application, BellSouth improved its responsiveness with respect to some particular WorldCom issues but remained relatively unresponsive on others. Lichtenberg Reply Decl. ¶¶ 54-56. KPMG recently opened new observations in Florida regarding the failure of BellSouth's account team to respond effectively to CLEC inquiries, supplementing an earlier observation to similar effect. *See* Observation 170 (deficiencies in External Response Team sub-process); Observation 165 (Account Team/CLEC Care Team documentation is unclear); Observation 115 (account team does not respond in timely fashion).

The Georgia Commission states that BellSouth's performance is adequate. With respect to BellSouth's failure to implement many prioritized changes, the Georgia Commission notes that BellSouth has now committed to implementing in 2002 the CLECs' top 15 change requests. But as WorldCom has explained previously, this is a paltry number, especially given that BellSouth withdrew the planned implementation of the industry standard Local Service Ordering Guide ("LSOG") 5 release in order to make this commitment. Other ILECs are able both to implement industry standard changes and to implement a significant number of prioritized changes. Moreover, BellSouth's short term promise at most would facilitate essential changes this year; it would not alter BellSouth's ongoing practice to ensure that necessary changes continue to be implemented thereafter. Nor does BellSouth's 40% proposal address this problem – as we have said before. Despite the Georgia Commission's nominal praise of the 40% proposal, there is still an open docket indicating that the Commission believes the issue may need further work.

The Department of Justice notes the "positive steps taken in the area of change management" but acknowledges that important issues remain to be resolved. DOJ Eval. at 17-18. But the modifications made to date, while helpful, do not resolve the core issues with the process. For example, DOJ itself found that recent changes were implemented "without adequate testing and with defects." DOJ Eval. at 10. DOJ does not explain how any of the steps already taken will address that problem or will ensure that BellSouth implements sufficient changes. More is needed to show BellSouth's change management process is now ready than ongoing negotiation over the change management process. BellSouth, for example, must at a minimum agree to include billing in change management, eliminate the back-room process in which it re-prioritizes changes without CLEC input, make IT personnel a more integral part of the process, agree to a plan ensuring implementation of prioritized changes in a fixed period of time, take steps to improve its internal testing of releases to avoid introduction of releases with substantial defects, and ensure that defects are corrected more quickly. Lichtenberg Decl. ¶¶ 119-23, 133, 147-50; Lichtenberg Reply Decl. ¶ 46. It has not addressed any of these problems to date.[1]

B. BellSouth Has Not Fixed Problems With Its Due Date Calculator

WorldCom continues to submit a substantial number of supplemental orders requesting a change in due date. BellSouth has not fixed the problem with its due date calculator that leads it to return inaccurate due dates on *all* Firm Order Confirmations ("FOCs") for this type of order. BellSouth withdrew its prior commitment to fix this problem on March 23 and has not yet provided a new date on which it intends to fix the problem. Lichtenberg Reply Decl. ¶ 32.

In January, BellSouth informed WorldCom that the inaccurate due dates would be fixed as part of Change Request 620 – which was scheduled for April 6 and later moved up to March 23. This was so, BellSouth assured WorldCom, even though Change Request 620 did not appear to cover supplemental orders to change due dates. In late February, however, BellSouth's

[1] BellSouth must also offer a truly independent test environment. The Georgia Commission states that BellSouth's test environment is acceptable. It claims that BellSouth has refuted WorldCom's allegations that production transactions were sent to WorldCom's test environment. Ga. PSC Comments at 24. But it does not explain how this is possible given that BellSouth never responded to WorldCom's e-mails documenting there was a problem. There remains a significant risk of commingling of test and production orders. Moreover, the test environment has additional limitations as well. This is especially so because CLECs must manually enter special codes on every test order, making testing much more difficult than necessary. And BellSouth makes it more difficult than necessary for CLECs to test in the first place.

change control representative informed WorldCom that the change request would not cover this type of order – a position contradicted by the account team the very next day. Then, days before the March 23 change was scheduled to go into effect, BellSouth informed WorldCom that, just as WorldCom had previously suspected, the change would not correct the substantial problem identified by WorldCom. Lichtenberg Decl. ¶¶ 33-34. Indeed, BellSouth now blames the errors on the supplemental orders to change due dates on manual handling and states that no change to its systems will be required to correct this problem. BellSouth's explanation makes no sense. For it to be correct, 100% of WorldCom's supplemental orders to change due dates would have to fall to manual, which BellSouth has never previously suggested would occur, BellSouth service representatives would have to err in entering the due date on 100% of these orders, and the erroneous due dates entered would have to be unrelated to the due date in BellSouth's downstream systems – which are generally correct. Lichtenberg Reply Decl. ¶¶ 35-36.

BellSouth's failure to fix the problem as promised underscores the trouble with BellSouth's change management process described above. Such an important defect should have been corrected immediately. The ever-changing information provided by different BellSouth groups also underscores the need for BellSouth to provide better communication to CLECs and to involve Information Technology personnel in this communication. Lichtenberg Reply Decl. ¶ 37.

Moreover, BellSouth's failure to fix the problem of inaccurate due dates – and to provide any date on which it now intends to fix the problem – is a substantial problem in and of itself. This problem forces WorldCom to continue to rely on manual processes to check the due dates on the supplemental orders it submits. These manual processes significantly inflate WorldCom's costs, as WorldCom must use them on every supplemental order it submits for a change in due date. Lichtenberg Reply Decl. ¶ 36.

C. BellSouth Fails to Process Orders Accurately

BellSouth still has not shown that it can process orders accurately. Birch and Network Telephone, for example, both continue to experience significant problems with order accuracy, as does WorldCom. DOJ notes ostensible improvements in BellSouth's service order accuracy, as measured by BellSouth's metrics, but criticizes BellSouth for unilateral changes to the metrics that make it more difficult to assess whether improvement has occurred. DOJ Eval. at 13-14. But KPMG's Florida Exceptions regarding order accuracy remain open. WorldCom continues to experience mis-provisioning of features at roughly the same rate it has experienced for many months. Lichtenberg Reply Decl. ¶ 19. Moreover, DOJ does not address service order accuracy concerns that are not measured by the metrics – such as misrouting of intraLATA calls, loss of dial tone, or delayed updates to CSRs.

1. Mis-routing of IntraLATA Calls.

BellSouth continues to make errors in order processing that lead it to mis-translate its switches and assign the incorrect intraLATA carrier to customers. In fact, the problem has grown worse. The latest numbers show 4,220 customers with misrouted intraLATA calls in WorldCom's active records. Lichtenberg Reply Decl. ¶ 9. BellSouth continues to ignore this problem entirely. It has made no effort to resolve the problem despite its obvious importance.

Instead, contrary to its prior admission of a problem, BellSouth now asserts that there is no problem at all – that intraLATA calls of WorldCom customers are appropriately routed to

BellSouth's switches because BellSouth has expanded the local calling area for these customers. This explanation appears to be incorrect. Lichtenberg Reply Decl. ¶ 12. But if it were correct, this explanation would indicate an even greater problem than WorldCom previously understood. WorldCom has not agreed that BellSouth can expand the local calling area for its customers. By expanding the local calling area, BellSouth deprives the intraLATA carrier, generally WorldCom, of the revenue associated with intraLATA calls because those calls no longer pass through its switches where it records the information used to bill the customer. Lichtenberg Reply Decl. ¶¶ 13-14.

WorldCom theoretically could, as BellSouth suggests, take the information BellSouth transmits to it on the Daily Usage Feed ("DUF"), and use that information to bill its customers intraLATA rates for calls that were considered intraLATA calls when the customer was a BellSouth retail customer. This would be an arduous undertaking. Moreover, if WorldCom pursued this course, WorldCom customers would have no choice of intraLATA carrier. All WorldCom local customers would be billed by WorldCom for intraLATA calls (even though the calls passed through the BellSouth switches). This would seemingly violate the requirement of dialing parity. BellSouth retail customers have their choice of intraLATA carrier, but WorldCom customers would have no such choice. Lichtenberg Reply Decl. ¶¶ 15-16.

2. Delayed Updating of CSRs.

In addition to misrouting of intraLATA calls, BellSouth's order processing also continues to lead to delays in updates to Customer Service Records ("CSRs") to reflect that customers have migrated to CLECs. BellSouth has acknowledged that 7% of CSRs are not updated a full 72 hours after completion of an order, and it is possible many are not updated for far longer. Lichtenberg Reply Decl. ¶ 23. WorldCom recently audited 40 of its orders that were rejected for reasons such as "CLEC does not own the account" and determined that for at least 38% of the orders, the rejects were caused by delayed updates to the CSRs. Because the CSRs did not reflect that the customers belonged to WorldCom, the systems would not accept subsequent orders to change features or make other changes. In addition to the inaccurate rejects, BellSouth's delay in updating the CSRs can lead to double billing. Lichtenberg Reply Decl. ¶ 22.

3. Loss of Dial Tone.

BellSouth's order processing errors – in particular, its failure to place the proper codes on the two services orders BellSouth created from every CLEC order – also have continued to lead to loss of dial tone. Of course, on March 23, BellSouth implemented a new process – the Single C process that will ostensibly eliminate the problem of lost dial tone. But it is too early to know whether the Single C process is working. Lichtenberg Reply Decl. ¶ 28.

WorldCom conducted testing of the Single C order process in the BellSouth CAVE prior to the implementation of that release. The initial orders flowed successfully into the BellSouth interface but since the CAVE does not go all the way to the back-end legacy systems, WorldCom will not know the success or failure of this release until actual customer orders are provisioned. So far, BellSouth has identified an anomaly but it is too soon to tell the extent of the problem. Lichtenberg Reply Decl. ¶¶ 29-30. As for the two service order process in place when BellSouth applied, it is now clear that this process led to far more problems than BellSouth previously acknowledged. After years of contending that most of the lost dial tone experienced by WorldCom customers had nothing to do with migration, BellSouth has now provided information showing that at least some of the lost dial tone BellSouth has attributed to problems unrelated to the two service order process is actually the result of that process. Indeed, BellSouth has made an astonishing admission. BellSouth has acknowledged that because of the two service order process, it sometimes changes a customer's facilities during the course of a UNE-P migration. Not surprisingly, the change in facilities sometimes leads to loss of dial tone or degradation of service – that then is reported as a problem with facilities. There should never be a change of facilities on a UNE-P migration order. Lichtenberg Reply Decl. ¶¶ 25-27 & Att. 8.

The Georgia Commission suggests that WorldCom's statistics on lost dial tone are overstated because WorldCom calculates lost dial tone within 30 days of migration, rather than within 5 days of migration. Ga. PSC Comments at 22. But WorldCom has experienced lost dial tone – that BellSouth acknowledges was caused by the two service order process – beyond the 5 day period. Moreover, the sheer volume of lost dial tone WorldCom has experienced within 30 days of migration shows that the lost dial tone is related to the migration process. BellSouth has consistently refused to provide information showing the percentage of lost dial tone experienced by retail customers in a 30 day period, but it is almost certainly far lower than that experienced by WorldCom customers.

Thus, order accuracy problems continue to cause significant problems for WorldCom. Even if one of those problems has now been corrected with the move to a Single C process, something that is too early to evaluate, BellSouth's overall service order accuracy performance must improve significantly before it obtains section 271 authority.

D. BellSouth Manually Processes Too Many Orders

As AT&T, Birch and Network Telephone confirm, BellSouth continues to manually process far too many orders as a result of limitations of its own systems. New information BellSouth has provided to WorldCom further demonstrates that this is so.

Shortly before WorldCom filed its prior comments, BellSouth provided a breakdown of a sample of WorldCom orders that were manually processed. This breakdown showed that the vast majority of sampled orders were manually processed either because the retail customer had call forwarding or voice mail or because the orders included the "ZDCO," "OZIP" or "OISF" Feature Identifiers ("FIDs"). We have previously emphasized that basic UNE-P orders for customers with call forwarding or voice mail should flow through.

It is now clear that the same is true for orders with the ZDCO, OZIP or OISF FIDs. Initially, BellSouth was unable to explain at all what these FIDs were. It subsequently provided a limited explanation that provided very little clarification. But BellSouth did acknowledge that orders with these FIDs were manually processed as a result of BellSouth errors. BellSouth placed these FIDs on the orders as a result of limitations in its own systems. Lichtenberg Reply Decl. ¶¶ 40-42.

The impact of these limitations is significant. BellSouth provided a breakdown of WorldCom's Florida orders that showed that 18% of WorldCom's orders were manually processed as a result of BellSouth errors related to these FIDs, along with the voice mail/call forwarding issue. Lichtenberg Reply Decl. ¶ 43. There is no reason to think the result is any different in Georgia. Eighteen percent manual fall out as a result of particular BellSouth errors is far too high. WorldCom's orders are basic UNE-P orders that ostensibly were designed to flow through and all of which should flow through.

No BOC has been authorized to provide in-region long distance service while manually processing very basic types of UNE-P orders as a result of its own errors. In prior applications, a third-party test or other evidence indicated that almost all orders designed to flow through would flow through in the absence of CLEC errors. Here, that is not the case.

The Georgia Commission states that BellSouth's flow-through rates are improving, but it acknowledges that BellSouth's flow-through rate falls short of the Commission's own benchmarks. Ga. PSC Comments at 16. The Georgia Commission's analysis also presumes that BellSouth's flow-through numbers are accurate; yet it is clear that BellSouth is counting many orders that fall out as a result of its own errors as flow through orders. Lichtenberg Reply Decl. ¶ 42. Moreover, the Commission does not discuss BellSouth's failure to automate basic types of UNE-P orders or even to conduct the root-cause analysis necessary to determine why basic UNE-P orders are falling out.

BellSouth has been promising since October to automate processing of orders for customers with voice mail or call forwarding, but no fix is even scheduled until late May. BellSouth did not even identify the ZDCO and OZIP FIDs as a major source of manual fall out until February. And it only identified this issue in February as a result of constant pressure from WorldCom to conduct a root cause analysis of causes of manual fall out. BellSouth has not yet provided a date on which it will automate processing of orders on which it has added these FIDs. Until it fixes these problems, it should not be granted section 271 authority.

E. BellSouth Fails to Provide Complete Line Loss Reports

BellSouth has not corrected the deficiencies in its line loss report. Indeed, BellSouth has now acknowledged a significant additional problem on the automated line loss report it transmits to WorldCom. Lichtenberg Reply Decl. ¶ 5. WorldCom's audits also show the problem has gotten worse, despite a February 28 fix implemented by BellSouth that was supposed to ensure the line loss report was complete. Recent audits show that approximately 20% of customers are left off of the automated line loss report, which is a staggering proportion. Lichtenberg Reply Decl. ¶ 6.

Moreover, WorldCom's audit compared the data on the automated line loss report with the data on BellSouth's web site. But the data on the web site itself apparently does not include all of the line loss information. In Florida, KPMG recently opened an Exception because BellSouth failed to post 29% of line loss reports to its web site in a timely manner.

Accurate line loss reports are critical to a CLEC's ability to bill its customers accurately and avoid double billing. WorldCom's systems are set up based on automated line loss reports, so it is vital that BellSouth fix the automated reports. Lichtenberg Reply Decl. ¶ 6. Yet BellSouth has been unable to do so even though WorldCom has been complaining about this problem since August. Instead, BellSouth has again offered a series of different explanations for the line loss problem, again emphasizing the need for better assistance for CLECs and a better change management process.

CONCLUSION

BellSouth's Georgia-Louisiana application should be denied.

Respectfully submitted,

Marc A. Goldman
JENNER & BLOCK, LLC
601 13th Street, N.W., Suite 1200
Washington, D.C. 20005

(202) 639-6000

Lisa Smith
Keith L. Seat
WORLDCOM, INC.
1133 19th Street, N.W.
Washington, D.C. 20036

(202) 887-2993

March 28, 2002

Service List

I, Lonzena Rogers, do hereby certify, that on this twenty-eighth day of March, 2002, that I have caused a true and correct copy of WorldCom, Inc.'s Reply Comments in the matter of CC Docket No. 02-35 to be delivered by United States Postal Service first class mail, hand delivery or e-mail to the following:

William F. Caton
Acting Secretary
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, SW
CY-B402
Washington, DC 20554

Renèe Crittendon
Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Janice M. Myles
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Luin Fitch
US Department of Justice
Antitrust Division
Telecommunications and Media
Enforcement Section
1401 H Street, NW, Suite 8000
Washington, DC 20005

Leon Bowles
Division of the Telecommunications Unit
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

Arnold Chauviere
Utilities Division
Louisiana Public Service Commission
One American Place, Suite 1630
P.O. Box 91154
Baton Rouge, LA 70821

Qualex International, Inc.
Portals II
445 Twelfth Street, SW
CY-B402
Washington, DC 20554

Jonathan B. Banks
1133 Twenty First Street, NW
Room 900
Washington, DC 20036

Michael K. Kellogg
KELLOGG HUBER HANSEN TODD &
EVANS, PLLC
1615 M Street, NW
Suite 400
Washington, DC 20036

Mary C. Albert
Vice President, Regulatory and
Interconnection
Allegiance Telecom, Inc.
1919 M Street, NW
Suite 420
Washington, DC 20036

Patrick J. Donovan
Swidler Berlin Shereff Friedman, LLP
300 K Street, NW
Suite 300
Washington, DC 20007

Matthew D. Bennet
Policy Director
Alliance for Public Technology
919 Eighteenth Street, NW
Suite 900
Washington, DC 20006

David C. Hunter
Hunter Communications Law Group
1424 Sixteenth Street, NW
Suite 105
Washington, DC 20006

David Eppsteiner
AT&T Corp.
295 North Maple Avenue
Basking Ridge, NJ 07920

Peter D. Keisler
SIDLEY AUSTIN BROWN & WOOD
1501 K Street, NW
Washington, DC 20005

Rose Mulvany Henry
Birch Telecom of the South, Inc.
2020 Baltimore Avenue
Kansas City, MO 64108

Larry E. Robbins
WYRICK ROBBINS YATES & PONTON, LLP
4101 Lake Boone Trial
Suite 300
Raleigh, NC 27607

Robert J. Aamoth
KELLEY DRYE & WARREN, LLP
1200 Nineteenth Street, NW
Suite 500
Washington, DC 20036

Catherine Boone
Covad Communications Company
600 Fourteenth Street, NW
Suite 750
Washington, DC 20005

Genevieve Morelli
KELLEY DRYE & WARREN, LLP
1200 Nineteenth Street, NW
Washington, DC 20036

Marilyn H. Ash
Counsel - Legal & Regulatory Affairs
Mpower Communications Corp.
175 Sully's Trail
Suite 300
Pittsford, NY 14534

Jake E. Jennings
Vice President, Regulatory Affairs
NewSouth Communications Corp.
Two Main Street
Greenville, SC 29601

Sean A. Lev
Kellogg, Huber, Hansen, Todd & Evans
1615 M Street, NW, Suite 400
Washington, DC 20036

Laura H. Phillips
DOW, LOHNES & ALBERTSON, PLLC
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20004

H. Richard Juhnke
Sprint Communications Company, LP
401 Ninth Street, NW
Suite 400
Washington, DC 20004

Paul Guarisco
Shirley & Ezell, LLC
2354 South Acadian Thruway
Suite F
Baton Rouge, LA 70808

____
Lonzena Rogers